

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION
CASE NO.: 1:18-CR-88-RJC-WCM**

UNITED STATES OF AMERICA

v.

WANDA SKILLINGTON GREENE

DEFENDANT'S SECOND MOTION TO SEAL

NOW COMES Defendant Wanda Greene, through counsel and pursuant to LCrR 49.1.1, and moves that her Motion to Continue Sentencing be placed under seal. In support of this motion, the defense shows the Court:

1. On July 19, 2019, this Court denied the defense motion to seal without prejudice.
2. The Motion to Continue references the government's ongoing investigation into public corruption in Buncombe County. Rule 6 of the Federal Rules of Criminal Procedure imposes a broad rule of secrecy over matters occurring before the grand jury. The government has an independent interest in protecting the confidentiality of its investigation.
3. Sealing is therefore necessary and there are no alternatives in this instance.
4. The defense asks for sealing until the current grand jury investigation is complete. The defense has no objection to unsealing after the grand jury investigation is complete.
5. Assistant U.S. Attorney Richard Edwards has been consulted and does not object to this motion.

Dated: July 25, 2019

Respectfully submitted,

/s/ Noell P. Tin

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Counsel for Ms. Greene

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he has served the foregoing DEFENDANT'S SECOND MOTION TO SEAL with the Clerk of Court using the CM/ECF system, which will send notification of such filing to opposing counsel:

Richard Edwards
Assistant U.S. Attorney
richard.edwards2@usdoj.gov

Dated: July 25, 2019

/s/ Noell P. Tin